



October 20, 2021

Martin Parsons, Director  
Kristin Hess, Deputy Director  
Department of Natural Resources,  
Division of Mining, Land & Water  
550 W. 7th Avenue, Suite 1070  
Anchorage, Alaska 99501

**RE: Ambler Access Project / Alaska Industrial Development and Export Authority AS 38.05.850 Application for Easement**

Dear Director Parsons and Deputy Director Hess:

The Alaska Industrial Development and Export Authority (Applicant) hereby submits its formal application to secure an easement from the Department of Natural Resources, Division of Mining Land and Water (DNR), across the State of Alaska Lands as specifically identified and described in the attached AS 38.05.850 Application for Easement (Application). Applicant respectfully requests that DNR approve the proposed easement for the purpose of consolidating a right-of-way across state, federal, borough and ANCSA corporation lands, and financing and constructing a controlled, industrial-access road (the “Ambler Access Project” or “Project”) to open currently inaccessible State of Alaska lands in the Ambler Mining District to potential future economic development activities.

The Ambler Mining District is a large prospective copper-zinc mineral belt with deposits of cobalt, germanium, gallium and platinum group elements. These strategic and critical minerals are essential, secure and reliable resources for our nation’s tech-focused economic expansion and our nation’s military preparedness. Development of the Ambler Mining District aligns with state and federal policy to identify and access new domestic sources of critical minerals, increase domestic certainty at all levels of the supply chain (exploration, mining, concentration, and separation) and streamline the leasing and permitting processes to expedite the exploration and production of strategic and critical minerals. The planned surface transportation route will promote the health, security, and general welfare of the people of Alaska, and it will increase job opportunities and otherwise encourage the economic growth of the state through the development of its abundant natural resources, which, without this critical infrastructure, will remain stranded.

As this request for easement facilitates access to Alaska’s abundant natural resources, generally, and the Ambler Access Project, specifically, serves a public purpose and is in the public interest,

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Applicant respectfully requests that DNR waive all fees associated with processing the attached Application and maintaining the right of way easement.

Applicant is a political subdivision of the State of Alaska serving in the public interest with the specific statutory charge to promote, develop, and advance the general prosperity and economic welfare of the people of Alaska. The Ambler Access Project was conceived and is being pursued by Applicant consistent with this statutory direction. The Project, which will extend key infrastructure into remote, difficult to access areas of the state, is intended to realize the promises of the Statehood Act, pursuant to which the state selected lands in the Ambler Mining District for purposes of future mineral development to support the state's economic wellbeing. The Project is undertaken consistent with the additional commitments Congress made to the state with the passage of the Alaska National Interest Lands Conservation Act (ANILCA), wherein Congress specifically acknowledged its obligation to allow for a surface transportation route across federal lands to facilitate resource development activities on state and ANCSA corporation lands in the Ambler Mining District.

When complete, the Ambler Access Project will be a point-to-point controlled, industrial-access road that will establish permitted access from the Dalton Highway to the Ambler Mining District, which road will facilitate mining exploration and development activities in the area, consistent with the March 2020 Ambler Road Final Environmental Impact Statement, the July 2020 Ambler Road Record of Decision issued jointly by the U.S. Bureau of Land Management (BLM) and U.S. Army Corps of Engineers (USACE), and the July 2020 Record of Decision issued jointly by the Secretaries of the Interior and Transportation on Alignment of the Ambler Road through the Kobuk Preserve (collectively, the "Ambler Road RODs"):

Final EIS ~

[https://eplanning.blm.gov/public\\_projects/nepa/57323/20015364/250020506/Ambler\\_FEIS\\_Volume\\_1-\\_Chp\\_1-3\\_&\\_\\_Appendices\\_A-F\\_.pdf](https://eplanning.blm.gov/public_projects/nepa/57323/20015364/250020506/Ambler_FEIS_Volume_1-_Chp_1-3_&__Appendices_A-F_.pdf)

BLM/USACE Joint ROD ~

[https://eplanning.blm.gov/public\\_projects/57323/200091317/20022329/250028533/Ambler%20Road%20Record%20of%20Decision.pdf](https://eplanning.blm.gov/public_projects/57323/200091317/20022329/250028533/Ambler%20Road%20Record%20of%20Decision.pdf)

DOI/DOT JROD ~ <https://www.federalregister.gov/documents/2020/08/04/2020-16906/availability-of-record-of-decision-selecting-a-route-for-the-ambler-mining-district-industrial>

Final EAA ~

<https://parkplanning.nps.gov/document.cfm?parkID=11&projectID=37092&documentID=10543>  
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Authorizing the proposed easement is critical to consolidating the preferred alternative right-of-way as established in the Ambler Road JRODs, which right-of-way crosses federal lands

administered by various federal agencies, surface lands owned by various ANCSA corporations, as well as lands owned by the state and the Northwest Arctic Borough.

Financing and developing the Ambler Access Project will achieve a long-established state policy priority of creating access to the vast state mineral bearing lands held across the south side of the Brooks Range. By financing and developing the infrastructure that will create that access, the state will be in a position to realize the value of the mineral lands it selected in that region as part of its Statehood land grant. Developing the Ambler Access Project will also allow the state to hold Congress to the commitments it made with the passage of ANILCA, wherein Congress specifically acknowledged its obligation to allow for a surface transportation route across federal lands so the state can access its lands in the Ambler Mining District.

Furthermore, in addition to the rentals and royalties the state will realize for the development of its mineral lands, development and operation of the Ambler Access Project will have additional, substantial economic benefits for the state and its residents based upon an Impacts Report by the University of Alaska dated June 28, 2019, including:

#### Road Construction and Operations

- An annual average of 360 direct jobs over the road construction period
- Up to 81 direct annual jobs for road operations and maintenance over the life of the road

#### Mines Construction

- 2,777 direct jobs for mine construction with \$286 million in wages annually
- 2,034 additional indirect and induced jobs with \$108 million in wages annually

#### Mining Operations

- 495 direct jobs with \$72 million in wages annually
- 3,436 additional indirect and induced jobs with \$228 million in wages annually
- additional access that could be used for emergency response and fiber optic infrastructure improving telecommunications for rural communities along the route;
- lower costs for fuel and other goods and services required in rural communities as needed supplies are trucked into roadside staging areas rather than flown in or delivered by barge; and
- \$1.3 billion in revenues for both local and state governments over the life of four mines anticipated to be developed during the 50-year term of the BLM and the NPS rights-of-way:

- \$393 million in mining license tax revenues to the State
- \$524 million in corporate income taxes to the State
- \$214 million in production royalties to the State
- \$13 million in claim rents to the State
- \$193 million in payments to local governments

The Alaska Legislature has determined that Applicant's role in facilitating the financing and development of critical infrastructure is "essential to the development of the natural resources and the long-term economic growth of the state and will directly and indirectly alleviate unemployment in the state." See AS 44.88.010(a)(4) and (b). When financing and developing critical infrastructure, the Legislature has further specifically determined that Applicant's investment serves a public purpose and is in the public interest. See AS 44.88.010(a)(10)(B) ("it is in the public interest to promote the prosperity and general welfare of all citizens of the state by encouraging the production of raw materials . . . through the establishment of a program that provides financial assistance in cooperation with federal, state, and private institutions for these purposes"); see also AS 44.88.010(b) ("It is declared to be the policy of the state . . . and a public purpose, to increase job opportunities and otherwise to encourage the economic growth of the state, including the development of its natural resources . . . by creating the Alaska Industrial Development and Export Authority with the powers, duties, and functions as provided in this chapter") and AS 44.88.010(c) ("It is further declared to be the policy of the state . . . and a public purpose of the state, to accomplish the objectives set out in (b) of the section through the provision of financial support to a federal, state, municipal, or private entity.")

Additionally, AS 44.88.010(a)(11) expresses the Legislature's finding that the Applicant, "acts in the state's interest to import private capital to create new economic activity that would not otherwise take place in the state."

That the Ambler Access Project serves a public purpose and is in the public interest is further demonstrated in the federal agency Ambler Road JRODs.

The National Environmental Policy Act (NEPA) requires a project proponent to demonstrate a public purpose and need for a proposed project requiring the preparation of an Environmental Impact Statement. The BLM in its FEIS for the Ambler Access Project determined that the Project's purpose is to support mineral resource exploration and development in the Ambler Mining District, providing surface transportation access to the District and allowing for expanded exploration, mine development, and mine operations at mineral prospects throughout the District on land owned by the State of Alaska, thereby producing revenue and taxes for the state treasury.

In the FEIS, the BLM noted that Applicant has identified multiple public benefits related to the Project's purpose, including direct employment for road construction and operation, indirect employment related to mining, revenues paid to local and state governments and Alaska Native

corporations, and commercial access opportunities for nearby communities in close proximity to the road.

The USACE in the Joint Record of Decision for the Ambler Road defined the Project's purpose as providing transportation access to the Ambler Mining District to support mineral exploration and development. Defining the overall Project purpose is the responsibility of the USACE, which must consider the public interest. Consistent with this responsibility to the public, the USACE has defined the overall Project purpose as: providing year-round surface transportation access for mining exploration and development in the Ambler Mining District.

Please let me know if you have any questions regarding the attached Application and supporting documentation. I am also available at your convenience to discuss our requested waiver of the fees associated with processing the Application and maintaining the easement.

Sincerely,



Alan Weitzner  
Alaska Industrial Development and Export Authority  
Executive Director

**Attachments**

- Application for Easement AS 38.05.850
- Ambler Access Project Development Plan
- Applicant Environmental Risk Questionnaire